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January 23, 2024

BY ECF

Honorable Miroslav Lovric
United States Magistrate Judge
United States District Court
Northern District of New York
Binghamton U.S. Courthouse
15 Henry St.
Binghamton, NY 13901

**Re: *Barzman v. SUNY Binghamton, et al.*,
Case No. 3:22-CV-367 (TJM/ML)**

Hon. Judge Lovric:

This firm represents Plaintiff Karen Barzman, Ph.D., in the above-referenced case. I submit this letter jointly with counsel for Defendants, AAG Lauren Eversley, to request an extension of time for the disclosure of expert witnesses. Defendants' expert disclosure on economic damages and Plaintiff's expert disclosure on psychological damages are both currently due February 1, 2024.

First, Defendants request additional time to serve disclosures related to their economic damages expert. The reason is there were internal, logistical issues that Defendants' counsel had to overcome, and such extension would allow Defendants' expert the appropriate amount of time to finalize a report. Defendants' request that the deadline be extended until March 1, 2024.

Second, Plaintiff requests additional time to serve her psychological expert witness disclosure and report. The reason is that the psychological expert retained by Plaintiff's counsel has two cases going to trial in the coming weeks, and she will be busy preparing for them. In order to give her adequate time to prepare her report on behalf of Dr. Barzman, Plaintiff respectfully requests that Plaintiff's expert disclosures related to psychological damages be due April 1, 2024.

If granted, these requests would not alter the April 30, 2024 fact discovery deadline.

Thank you for your time and consideration of this matter.

Respectfully submitted,

/s/ Amy E. Robinson
Amy E. Robinson
Counsel for Plaintiff

/s/Lauren Eversley
Lauren Eversley
Counsel for Defendants